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December 2, 2022

Via ECF

Hon. Loretta A. Preska  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: USA v. Erdal Dere, 20 Cr. 501 (LAP)

Dear Judge Preska:

I represent Erdal Dere in the above referenced case. Mr. Dere seeks to expand his bail limits for the brief period from March 25 to April 1, 2023, for a family trip to Florida by plane instead of car. By memo endorsement dated May 12, 2021, Mr. Dere's geographic bail limits were extended to allow on notice short family related visits and sports related trips with his young children to other states by car as only permitted by Pre-Trial Services on 48 hours' notice to them and the government. Per that endorsement all trips would be made by car and be limited to the East Coast of the United States. This request is in line with this prior endorsement, except the request is to make the trip by plane, because otherwise the car trip would take too long. The government has no objection to this request and has seen a copy of this letter. Pre-Trial Service will be so advised. Accordingly, may this letter application be so ordered. Thank you very much.

EO ORDERED

*Loretta A. Preska*

LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

12/20/22

Respectfully submitted,

*Elliot G. Sagor*

Elliot G. Sagor

Cc: AUSA Sarah Mortazavi